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December 20, 2004

Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

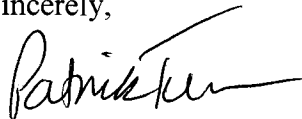
Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region
InterLATA Services Pursuant to Section 271 of the Telecommunications Act of
1996
Docket No. 2001-209-C

Dear Mr. Terreni:

Enclosed for filing are the original and 10 copies of BellSouth Telecommunications, Inc.'s ("BellSouth's") performance data change Notification Reports for January 2005 and preliminary February 2005. These data change Notification Reports are being provided to inform the Commission of the changes BellSouth plans to make to its Performance Measures Analysis Platform ("PMAP") with January data, and previews the changes BellSouth is considering making for February data. A Data Disclosure Report for December 2004 would be filed at this time as well, if needed; however, for December 2004 there are no additional South Carolina validated data issues to be disclosed that affect performance measurement calculations for which a fix has not yet been scheduled.

There is one additional item that BellSouth would like to bring to the attention of the Commission and the parties. In its October 2004 Data Notification filed on September 13, 2004, BellSouth provided notice of mechanizing the LNP Measures (Item No. 4). Although BellSouth expected to make this change with October 2004 data, it will be implemented with November 2004 data instead.

Sincerely,



Patrick W. Turner

PWT/sgm

Enclosure

cc: All Parties of Record

PC Docs # 563213

PROPOSED JANUARY 2005 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the January 2005 data month. Results for the January 2005 data month will be posted as follows:

Preliminary results February 21, 2005

Final results February 28, 2005

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Pre-Ordering Measurements

(1) *Affected Measures:* OSS-2 & OSS-3

Description of Change: Currently, there is a problem with the way the raw data is displayed for these measures. The records in the raw data are listed by instances of unique availability results instead of unique server. As an example, for OSS-2 for the July data month and the BOCRIS/CRIS application, the twelve servers that have this application loaded were included in the report. Eleven of these servers had 100% availability and one of them had 99.97% availability. The raw data showed two records, one with 100% and one with 99.97%. The reports were correct and complete. BellSouth proposes to correct this problem to display all the servers in the raw data. This proposed change was Item (1) on the Preliminary December Data Notification filed on November 1, 2004. (RQ5804)

Impact of Change: None to reported results.

Provisioning Measurements

- (2) *Affected Measures:* P-7, P-7A, P-7B & P-7C

Description of Change: Currently, BellSouth is omitting Unbundled Copper Loop Coordinated Orders from these measures. BellSouth proposes to include Unbundled Copper Loop Coordinated Orders in the Hot Cut measures. (RQ4104)

Impact of Change: There was no volume change to the data from January 2004 to September 2004

- (3) *Affected Measures:* P-7C

Description of Change: Currently, Bellsouth is omitting Unbundled Copper Loop Non-Coordinated Orders from this measure. BellSouth proposes to include Unbundled Copper Loop Non-Coordinated Orders in this measure. (RQ4105)

Impact of Change: From January 2004 to September 2004, in Georgia, the implementation of this change would have caused an overall increase of 0.02% in the results.

- (4) *Affected Measures:* P-9

Description of Change: Currently, the Access Carrier Name Abbreviation (ACNA) codes in the supporting data files are being directly populated from the Service Order Fact table. BellSouth proposes to use the same lookup procedure utilized to populate the SQM Reports to more accurately assign the Service Order ownership for Local Interoffice Trunks in the supporting data files. This proposed change was Item (2) on the Preliminary December Data Notification filed on November 1, 2004. (RQ5545)

Impact of Change: None to reported results.

- (5) *Affected Measures:* P-4 & P-4A

Description of Change: Instead of using denial and restoral orders to manage customer non-payment situations, some CLECs issue an order for new service followed by a disconnect order for this purpose. Because service is already working at the location, the order for new service is a request for an additional line and is therefore identified as requiring dispatch of a technician to complete the order. BellSouth has been monitoring these orders, manually stopping the dispatch and assigning them an "L" appointment code because the now non-dispatch order has the longer dispatch installation interval due to the way the CLEC used this process. BellSouth proposes to mechanize this "L" code assignment to avoid errors resulting from the manual process using the same criteria

currently used to assign the code manually. This proposed change was Item (3) on the Preliminary December Data Notification filed on November 1, 2004. (RQ5786)

Impact of Change: For May 2004, in Georgia, 328 orders would be excluded from the data. The interval for OCI would be reduced by .04 days.

- (6) *Affected Measures:* P-13D (Florida, Georgia, Kentucky, Louisiana, North Carolina, and Tennessee)

Description of Change: Currently, one of the Non-Wireless LNP filters is inappropriately applied causing some ELMS6 submitted records to be excluded from this measure. BellSouth proposes to update the code to appropriately apply this filter to these records. This proposed change was Item (4) on the Preliminary December Data Notification filed on November 1, 2004. (RQ5918)

Impact of Change: For July 2004, in Florida, the results would have dropped from 92.20% to 84.12%. In the Region, the results would have increased from 72.24% to 76.37%.

M&R Measurements

- (7) *Affected Measures:* MR-1, MR-2, MR-3 & MR-4

Description of Change: Currently, the Operating Company Name (OCN) codes in the supporting data files are being directly populated from the Trouble Ticket tables. BellSouth proposes to use the same lookup procedure utilized to populate the SQM Reports to assign the ticket ownership in the supporting data files, as in the case of line splitting/line sharing (dual ownership). This proposed change was Item (5) on the Preliminary December Data Notification filed on November 1, 2004. (RQ5523)

Impact of Change: None to the reported data.

- (8) *Affected Measures:* MR-2

Description of Change: Currently, PMAP uses the RESH code to identify the CLEC to which a line is assigned. The RESH code format for resold services should be an "R" followed by the CLECs Operating Company Name (OCN). In some cases, the character is not present on ISDN lines and the record is assigned to an error file because PMAP cannot identify the CLEC. BellSouth proposes to change PMAP to accept either an "R" or a blank as the first character in these situations so that the record will be assigned to the proper CLEC. This proposed change was Item (6) on the Preliminary December Data Notification filed on November 1, 2004. (RQ5743)

Impact of Change: For August 2004, in the BellSouth Region, approximately 200 lines would be added to the resale ISDN line count which would account for a decrease in CTRR of .07%.

561060

PRELIMINARY FEBRUARY 2005 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the February 2005 data month. Results for the February 2005 data month will be posted as follows:

Preliminary results	March 21, 2005
Final results	March 31, 2005

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

Ordering Measurements

(1) *Affected Measures:* OSS-1

Description of Change: Currently, PMAP is counting test transaction for LENS and EDI in the CLEC volume for this measure. BellSouth proposes to exclude these test transactions. (RQ5877)

Impact of Change: For September 2004, .02% of the LENS transactions were test transactions. For EDI, .003% were test transactions.

(2) *Affected Measures:* O-9 (Georgia and Kentucky)

Description of Change: Currently, the minimum number of minutes for the >6 hour interval bucket for this measure is set to 369 minutes instead of 360 minutes. This is causing LSRs confirmed between 360 and 368 minutes not to be reported in this interval bucket. BellSouth proposes to correct this problem. (RQ5944)

Impact of Change: None to measurement results.

Provisioning Measurements

- (3) *Affected Measures:* P-7, P-7A, P-7B & P-7C

Description of Change: Currently, BellSouth is displaying an extra character to the beginning of the ACNA code in the raw data for these measures. BellSouth proposes to remove the extra character to the ACNA. (RQ5809)

Impact of Change: None to measurement results.

Other Measurements

- (4) *Affected Measures:* All

Description of Change: Where a CLEC enters into an agreement(s) with BellSouth for services not subject to the SQM plan, such services should not be reflected in the SQM data in accordance with the parties' agreement(s). BellSouth will implement coding changes to effect this change. (RQ5868)

Impact of Change: None.

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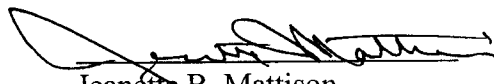
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